


UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
DEL RIO DIVISION

FILED

AUG 12 2024

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY  DEPUTY CLERK

UNITED STATES OF AMERICA

VS.

SAMAN MAHMOUDPOUR

§  
§  
§  
§  
§  
§  
§  
§  
§  
§

CAUSE NO.: DR24-1489M

STIPULATION OF FACTS

The United States of America, by and through the United States Attorney for the Western District of Texas and the undersigned Assistant U.S. Attorney, the Defendant, and Defense counsel hereby stipulate that if this matter were to proceed to trial, the United States would establish by legal and competent evidence the following facts beyond a reasonable doubt:

On May 18, 2024, **SAMAN MAHMOUDPOUR** (Herein after "Defendant") unlawfully entered or attempted to enter the United States near Eagle Pass, Texas within the Western District of Texas, at a time and place other than that designated by United States immigration officials for the entrance of immigrants into the United States. The Defendant is an alien and citizen of IRAN. The Defendant committed all of the foregoing acts knowingly and voluntarily with the specific intent to violate the law.

Respectfully submitted,


JAIME ESPARZA  
United States Attorney

By:

  
JOSHUA B. BANISTER  
Assistant United States Attorney


After consulting with my attorney, I hereby stipulate the above Statement of Facts is true and accurate, and had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt. I accept responsibility for my actions in this case and apologize for having committed this offense.

Signed this 12 day of AUGUST, 2024.

  
x  
SAMAN MAHMOUDPOUR  
Defendant

I am Defendant's Attorney, I have carefully reviewed the above Stipulation of Facts with the Defendant. To my knowledge, Defendant's decision to stipulate to such facts is informed and voluntary.

Signed this 12 day of AUGUST, 2024.

  
MARY CAROL PIETRAZE  
Defendant's Attorney

Adopted and approved this 12<sup>th</sup> day of August, 2024.

  
ERNEST GONZALEZ  
United States District Judge